

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
BANKRUPTCY DIVISION

In Re:) Chapter 7
KATIA F. TSE) Case No. 10-22361-JNF
Debtor)

MOTION OF COUNSEL TO DEBTOR FOR AUTHORITY TO
SUBMIT DEBTOR'S HOME ADDRESS UNDER SEAL

To the Honorable Joan N. Feeney, Bankruptcy Judge:

Now comes the undersigned Counsel to the Debtor and requests that this Court allow him to submit under seal the residential address of the Debtor and in support thereof, counsel states the following:

1. The petition that was filed indicated a post office box in Somerville, Massachusetts as the mailing address of the Debtor.
2. Due to prior domestic violence issues, the Debtor is concerned with the public disclosure of her present residential address.
3. Counsel to the Debtor seeks authority to submit under seal a statement of her present residential address so that same is available to the Clerk and the Chapter 7 Trustee but it is not subject to the public record.
4. If this Motion is allowed by the Court, the undersigned Counsel will deliver to the Clerk's office and to the Chapter 7 Trustee an envelope containing the Debtor's residential address.

WHEREFORE, for the foregoing reasons, Counsel to the Debtor requests that this Court allow the Debtor's residential address to be submitted to the clerk of the United

11/23/2010 Allowed.

Joan N. Feeney

States Bankruptcy Court under seal and that the Debtor be granted such other and further relief as is just.

Katia F. Tse
By her Counsel,

Dated: November 12, 2010

/s/Gary W. Cruickshank, Esq.
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Boston MA 02110
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CERTIFICATE OF SERVICE

I, Gary W. Cruickshank, hereby certify that a copy of the foregoing Motion has been served, unless otherwise stated, via regular United States mail, postage prepaid, upon the following parties:

United States Trustee
John W. McCormack Post
Office and Courthouse
5 Post Office Square, 10th Floor
Suite 1000
Boston MA 02109
(electronically)

Harold B. Murphy, Esq.
Hanify & King
Trustee in Bankruptcy
One Beacon Street
Boston MA 02108
(electronically)

Dated: November 12, 2010

/s/Gary W. Cruickshank, Esq.